



May 10, 2005

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Mr. David L. Priester
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Standardization Section
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Dear Mr. Priester:

Re: United States Standards for Grades of Strawberries
Docket #FV-05-301

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining the need to proceed with a revision to the U.S. Grade Standard for strawberries. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations.

Tolerance Percentages:

In reviewing comments from those who responded, it became clear that our members prefer that USDA continue to allow for tolerance percentages to be determined by volume and not by count. We feel the current system provides a more accurate assessment of the true condition of the fruit. By establishing the volume of the average size berry in a sample, and by allowing for size variations from the average, the current volume-based tolerance percentage system enables inspectors to achieve greater accuracy. To change to a count-based system would treat berries of varying sizes

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equally. This may be more expeditious, but from our perspective reduces the relevance and effectiveness of USDA inspections.

I hope these insights are helpful. Please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick A. Davis". The signature is fluid and cursive, with a prominent "P" and "A".

Patrick A. Davis
President